

ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
 Advanced Television Systems and Their) MM Docket No. 87-268
 Impact Upon the Existing Television)
 Broadcast Service)

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION

Pegasus Communication Corporation ("Pegasus"), by its attorneys, hereby supplements the Petition for Reconsideration of the digital allotment for stations WWLF, Hazleton, Pennsylvania and WILF, Williamsport, Pennsylvania, with the following material.^{1/} The Petition for Reconsideration was filed by Pegasus on June 13, 1997. That Petition asked, among other requested relief, that the Commission consider the digital television allotments for WWLF and WILF from their construction permit sites, rather than from their currently authorized license sites. The construction permits for these stations were granted only three weeks after the Digital Television Table of Allotments was released by the Commission, even though the construction permit applications for these facilities had been pending for well over a year at the time of the digital allotments.^{2/} As Pegasus intends to shortly begin construction of the new facilities for WWLF and WILF and to promptly commence operations from the new transmitter sites, it was respectfully requested that the Commission consider the new sites as the allotment locations for digital television purposes.

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^{1/} Pegasus is the parent company of the licensees of these stations.

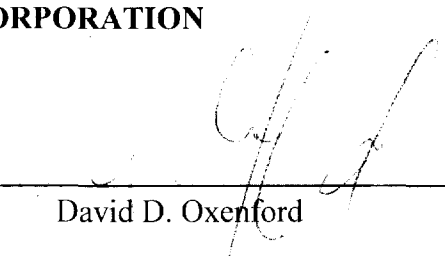
^{2/} See FCC File Nos. BPCT-951215KF and BPCT-960214KF.

Attached hereto is supplemental material from du Treil, Lundin & Rackly, consulting engineers for Pegasus. This material consists of an engineering showing evaluating the digital service that can be provided by WWLF. As shown in the attached engineering statement, a digital television allotment from the current licensed site would provide service to 862,000 persons within a service area of 11,080 square kilometers. From the construction permit site, however, the coverage would be significantly larger, providing a service to 1,205,000 persons within 15,030 square kilometers. In connection with the grant of the construction permit, the Commission determined that the operation from the construction permit site, even though it required waivers of certain Commission shortspacing rules with respect to other stations, was in the public interest because it provided service to a substantially greater population and equalized WWLF, the Fox affiliate for the Wilkes Barre/Scranton television market, with the other network affiliates within that market. For the same reason, the digital television allotment should be at the construction permit site, the same site to be used by the other stations in that market, rather than at the more isolated site up to now used by WWLF.

For these reasons, the reference coordinates for the digital television allotment for WWLF and WILF should be changed to those specified in the current construction permit.

Respectfully submitted,

**PEGASUS COMMUNICATIONS
CORPORATION**

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Dated: August 22, 1997
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du Treil, Lundin & Rackley, Inc.

A Subsidiary of A.D. Ring, P.A.

TECHNICAL STATEMENT
PREPARED ON BEHALF OF
WOLF LICENSE CORP.
TO PROVIDE SUPPLEMENTAL INFORMATION
SIXTH REPORT AND ORDER IN
MM DOCKET NO. 87-268

This technical statement was prepared on behalf of WOLF License Corp., licensee of TV station WWLF-TV on channel 56 at Hazleton, Pennsylvania. The purpose is to provide supplemental information in support of the previously filed Petition for Reconsideration (Petition) in the **Sixth Report and Order** in MM Docket No. 87-268 (6th R&O) pursuant to the FCC's Order in the 6th R&O (adopted: July 2, 1997, released: July 2, 1997, DA 97-1377). The Petition requested that the FCC base the DTV allotment for WWLF on use of its authorized (CP) operation (BPCT-951215KF). Information based on OET Bulletin No. 69 is provided in support of the Petition's proposal.

Station WWLF is currently licensed (BLCT-880810KI) to operate on NTSC channel 56 at Hazleton with a directional antenna maximum effective radiated power (ERP) of 1000 kW and an antenna height above average terrain (HAAT) of 329 meters. The table of DTV allotments contained in the 6th R&O authorized WWLF to operate on DTV channel 9 with an ERP of 3.2 kW and an HAAT of 329 meters. These facilities were based on the licensed WWLF operation.

Station WWLF is authorized by outstanding construction permit (BPCT-951215KF) to relocate transmitter site and operate on channel 56 at Hazleton with a directional antenna maximum ERP of 1580 kW and an HAAT of 505 meters. Presuming channel 9 is the ultimate

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DTV allotment for WWLF, it is estimated that the facilities necessary to replicate the authorized WWLF operation would be an ERP of 0.9 kW and an HAAT of 505 meters.

A DTV propagation analysis computer program available through the National Telecommunications Information Agency (NTIA) in Boulder, Colorado has been used to determine the calculated areas of service and interference based on WWLF's current DTV allotment and the proposed DTV allotment from the authorized site. The NTIA program uses the Longley-Rice propagation model and the general technical criteria contained in OET Bulletin No. 69 entitled "Longley-Rice Methodology for Evaluating TV Coverage and Interference."

Figure 1 is a map based on the WWLF's current DTV facilities (channel 9, ERP 3.2 kW/HAAT 329 m) which depicts areas where the DTV noise-limited signal (36 dBu-High VHF), calculated using the methods contained in OET Bulletin No. 69, would be provided (clear areas), areas where existing NTSC and DTV interference is predicted to occur (areas shaded with a ".") and areas where the DTV terrain-limited signal would be less than the threshold value (areas shaded with a "o"). As indicated, a DTV noise-limited signal of 36 dBu would be provide to 862,000 persons within 11,080 square kilometers.

Figure 2 is a map based on the WWLF's proposed DTV facilities (channel 9, ERP 0.9 kW/HAAT 505 m) from the authorized site (BPCT-951215KF) which depicts areas where the DTV noise-limited signal (36 dBu-High VHF), calculated using the methods contained in OET Bulletin

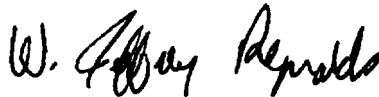
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No. 69, would be provided (clear areas), areas where existing NTSC and DTV interference is predicted to occur (areas shaded with a ".") and areas where the DTV terrain-limited signal would be less than the threshold value (areas shaded with a "o"). As indicated, a DTV noise-limited signal of 36 dBu would be provide to 1,205,000 persons within 15,030 square kilometers.



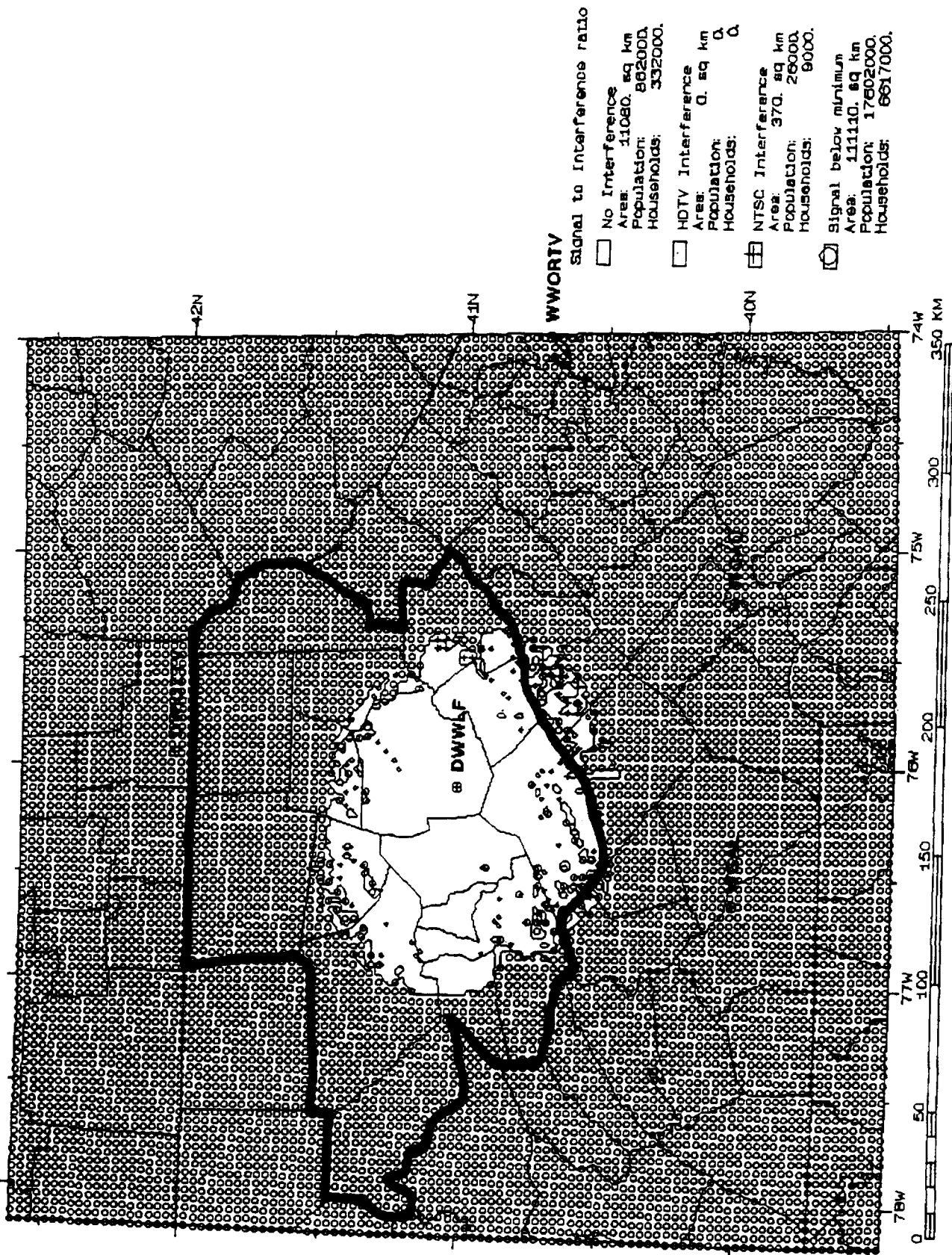
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August 21, 1997

WWLF-TV - AUTHORIZED DTV CHANNEL 9

Figure 1



PROPOSED WWLF-TV - (CP SITE) DTV CHANNEL 9

Figure 2

